

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Patrick Berry, Henrietta Brown, Nadine Little, Dennis Barrow, Virginia Roy, Joel Westvig, Emmett Williams, *on behalf of themselves and a class of similarly-situated individuals*; and ZACAH,

Plaintiffs,

Civil Action No. 20-cv-02189

vs.

**DECLARATION OF BILAL
MURAD ON BEHALF OF
ZACAH**

Hennepin County; Hennepin County Sheriff David Hutchinson, *in his individual and official capacity*; City of Minneapolis; Minneapolis Mayor Jacob Frey, *in his individual and official capacity*; Minneapolis Chief of Police Medaria Arradondo, *in his individual and official capacity*; Superintendent of the Minneapolis Park and Recreations Board Al Bangoura, *in his individual and official capacity*; Park Police Chief at the Minneapolis Park and Recreation Board Jason Ohotto, *in his individual and official capacity*; Police Officers John Does; and Police Officers Jane Does,

Defendants.

I, Bilal Murad, M.D., hereby declare as follows:

1. I have been an interventional cardiologist in the Twin Cities for over 20 years, after graduating from Aga Khan University Medical School in Karachi, Pakistan

and immigrating in 1993. Alongside my wife, Dr. Naheed Murad, I have also been involved in various community projects for the past two decades related to healthcare and social justice.

2. I am the Founder and President of Zakat, Aid and Charity Assisting Humanity (ZACAH), a Plaintiff in this lawsuit. I submit this Declaration in support of Plaintiff's Motion for a Temporary Restraining Order, asking the Court to enjoin Defendants from taking any action to forcibly remove people experiencing homelessness from public spaces, destroy property, or otherwise negatively interfere with the encampments of unhoused persons.

3. ZACAH is a volunteer-run, privately-funded charitable organization that provides support for Minnesotans facing poverty and the threat of displacement and unsheltered homelessness, especially from marginalized religious, socioeconomic and ethnic communities.

4. ZACAH is a Muslim-run, community-oriented, grassroots organization with zero paid staff or volunteers. The entire board is composed of full-time professionals in healthcare and education, and one student, all who dedicate their limited free time to ZACAH.

5. ZACAH's mission is to provide emergency financial assistance to residents of Minnesota on the verge of experiencing homelessness. ZACAH seeks to support people in transitioning from a state of vulnerability, back toward a path of sustainability.

6. ZACAH fulfills this mission by providing funds for rent, utilities, car payments, childcare and other vital needs. Approximately 95% of ZACAH's budget prior to March of 2020 was spent on this part of ZACAH's mission.

7. The remaining 5% of ZACAH's budget was allocated to operating a transitional home to serve women who may be survivors of domestic violence; immigrants; refugees; experiencing homelessness following eviction; or simply unable to financially maintain a home. ZACAH provides these women the ability to live without any cost for at least three months, so they can resume the path of independent living. During this time, we connect them with social services, help them with job searches, support them in enrolling in ESL classes when needed, and may even be able to help find a donated car for them, if necessary. Our goal is to avoid chronic homelessness and work alongside residents to establish financial independence, so that they can live with their children in the peaceful, safe and stable home that everyone has a right to.

8. On June 9, 2020, when hundreds of unsheltered people seeking refuge at the former Sheraton Minneapolis Midtown Hotel were effectively evicted from the premises, ZACAH was contacted by volunteers with the Minneapolis Sanctuary Movement. Two days later, ZACAH booked a hotel room for a young woman at Powderhorn West who was experiencing severe post-traumatic stress disorder at the park.

9. Since then, community members have coordinated a rapid emergency response, arranging for food, water, sanitation, community safety and medical support across park land in Minneapolis.

10. As soon as evictions of encampments began with Powderhorn East, ZACAH collections became almost exclusively directed at funding emergency hotel stays for displaced encampment residents, many of whom had lost belongings and all of whom had nowhere else to go. Shelter capacity is severely constrained due to the pandemic, and many residents have had dangerous, traumatic experiences at shelters that prevent them from ever going back.

11. As of October 13, 2020, ZACAH has received \$155,715 in donations. The initial intention was to use these funds to pay first-month's rent and security deposit for individuals who needed it, to help them transition to permanent housing. Instead of using those funds to further its core mission of getting and keeping our neighbors housed, ZACAH has spent approximately \$113,000, mostly to pay for hotel rooms for displaced people. Since June, ZACAH has sponsored over 2000 nights for approximately 500 people. ZACAH's hotel program is incredibly low-barrier, reflecting our core belief — grounded in Islamic principles — that every single person deserves dignity and care. No one should have to prove they are deserving.

12. ZACAH has also provided funds for security at one of the hotels where displaced residents from a women's encampment are staying a large-capacity tent for another encampments, and childcare, auto repair, rental assistance and a used car for displaced encampment residents. ZACAH has also distributed gift cards and pre-paid debit cards to hotel residents.

13. If and when donations run out, those in hotels will have no place to go — right as the City and Park Board is conducting violent evictions at parks, removing even park land as an option for displaced families, and right as the temperature begins to drop.

14. The funds ZACAH has spent on emergency hotels have diverted ZACAH from its core mission of investing in permanent housing for people. While ZACAH is seeking to fill a gap left by the government's inability to address the magnitude of this crisis in a meaningful way and provide safe housing for people in encampments, ZACAH alone cannot sustain this work.

15. Despite an influx in CARES funding, the government has neglected its duty in funding organizations that are well established and exist to help people experiencing chronic homelessness — to the point that many of these organizations that are funded by the county are now seeking assistance from ZACAH.

16. If the government was fulfilling its duty to provide emergency housing for people experiencing homelessness, ZACAH could direct its resources and time to support people moving from hotels into permanent housing, which aligns with its core mission. Sweeping encampments is cruel and unusual punishment — withholding resources is an act of neglect.

17. To manage all of the assistance ZACAH is providing to displaced encampment residents, ZACAH has had to establish an entirely new system to organize referrals, process applications, negotiate with hotels, support residents in finding housing, treatment or jobs, and manage numerous other tasks to ensure people are not out on the streets.

18. ZACAH's volunteers and board members have dedicated countless hours to this work. For example, one board member and one volunteer estimate that collectively, they alone spend 50-60 hours a week working with more than 25 volunteers and placing people in emergency hotel rooms.

19. I am seeking an order asking that the Court stop Defendants from taking any action to sweep camps when residents have nowhere else to go in the midst of a global pandemic and to stop destroying people's property.

I state under penalty of perjury that the foregoing is true and correct.

Dated: October 18, 2020

A handwritten signature in black ink, appearing to read "Bilal Murad", with a horizontal line underneath the name.

Bilal Murad, MD